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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 BENJAMIN GALECKI,
15 Defendant.
16

Case No. 2:15-cr-00285-APG-EJY-2

**Joint Stipulation for Extension of
Time to File Defendant's Response
to the Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)
(Twelfth Request)**

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18 The Parties, through their respective counsel, request the current
19 September 8, 2022, deadline for Mr. Galecki's Response to the Government's
20 Motion to Substitute and Forfeit Property be extended by 90 days, with the
21 deadline reset for December 7, 2022.

22 Counsel for the government, Mr. Galecki, and co-defendant Charles Burton
23 Ritchie are still negotiating the terms of a stipulation that addresses for final
24 resolution the substitution and forfeiture issues before the Court and, if
25 successful, would negate the need for Mr. Galecki to file a Response. However
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1 and despite significant progress, two events necessitate additional time to resolve
2 this process.

3 First, counsel for Mr. Galecki and Mr. Ritchie proposed revisions to and
4 posed inquiries about the most recent revision to the draft stipulation on
5 July 14, 2022. Government counsel advises, however, that staffing and workload
6 issues render him unable to respond to those revisions and inquiries before the
7 September 8, 2022, deadline. Government counsel thus requires additional time
8 to respond to defense counsel's revisions and inquiries.

9 Second, Mr. Galecki recently underwent emergent heart surgery and his
10 counsel has not been able to contact him for the last several weeks. It is
11 presently unknown when communication can resume.

12 The additional time requested will thus allow continued negotiation of the
13 draft stipulation and give Mr. Galecki time to recuperate and participate in this
14 process. If, however, negotiations are unsuccessful, Mr. Galecki will file his
15 Response to the Government's Motion to Substitute and Forfeit Property (ECF
16 No. 582), present his own proposed forfeiture order for the Court's consideration,
17 or submit any other necessary motion for the Court's consideration.

18 Counsel do not make this request for purposes of delay but act with
19 diligence and for the purpose of resolving the final forfeiture order in an efficient
20 manner without extended litigation and without unnecessarily taxing judicial
21 resources.

22 Counsel thus respectfully jointly request a 90-day extension of
23 Mr. Galecki's Response.

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1 This is the twelfth request for an extension of time.

2 DATED this 1st day of September, 2022.

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4 RENE L. VALLADARES
Federal Public Defender

JASON FRIERSON
United States Attorney

5 /s/ Amy B. Cleary
6 By _____
7 AMY B. CLEARY
Assistant Federal Public Defender

/s/ Daniel D. Hollingsworth
By _____
8 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 BENJAMIN GALECKI,

7 Defendant.
8

Case No. 2:15-cr-00285-APG-EJY-2

**Order Resetting Deadline for
Defendant's Response to the
Government's Motion to
Substitute and Forfeit Property
(ECF No. 582)**

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10 **IT IS HEREBY ORDERED** that the current September 8, 2022, deadline
11 for Defendant's Response to the Government's Motion to Substitute and Forfeit
12 Property (ECF No. 582) is vacated, extended by 90 days, and reset for
13 December 7, 2022, by which Mr. Galecki shall either submit his Response, any
14 other filing he deems appropriate, or a signed stipulation by all the relevant
15 parties resolving the forfeiture issues.

16 **Dated** this 2nd day of September, 2022.

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19 UNITED STATES DISTRICT COURT JUDGE
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